

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

REPLY TO: 6EN-WR

Mr. Jim H Heslet P.O. Box 3344 Bartlesville, OK 74006

Re: Mechanical Integrity Test Failure

Inventory No. Well No. Location-Osage County, Oklahoma OS4748 4 NW/4, Sec. 4, T 27N, R 12E

Dear Mr. Heslet:

On August 20, 2014, the referenced injection well failed a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

Ms. Melanie Crawford Regulatory Specialist II Linn Operating, Inc. 14000 quail Springs Parkway, Suite 5000 Oklahoma City, OK 73134

Re: Overdue Mechanical Integrity Test and Test Failures

Inventory No.	Well No.	Location-Osage County, Oklahoma	<u>Status</u>
OS1001	191	SW/4, Sec. 9, T 23N, R 08E	Overdue 12/1/13
OS2872	NRU 17-1W	NE/4, Sec. 21, T 24N, R 07E	Overdue 2/11/14
OS2999	MGBUU G-14	SE/4, Sec. 27, T 26N, R 06E	MIT Fail 8/13/14
OS3002	MBU A-6	SW/4, Sec. 23, T 26N, R 06E	MIT Fail 8/21/14
OS3041	DENOYA 12	NW/4, Sec. 11, T 26N, R 06E	MIT Fail 8/27/14

Dear Ms. Crawford

The referenced injection wells are overdue or have failed mechanical integrity tests. They are, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

Osage Nation Environmental and Natural Resources Department

6EN-WR:daguinaga:10.10.14: ENF CODE: G

R:\DA\UIC\2015\1Q15\LINN_52

6EN-WR JOHNSEY

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Violation of Injection Pressure Limit

Inventory No.	Well No.	Location: Osage County, Oklahoma
OS6273006	NBU 24-W21	NE/4, Sec. 14, T 27N, R 5E
OS6273016	NBU 16-W24	SE/4, Sec. 11, T 27N, R 5E
OS6273050	NBU 11-W21	NW/4, Sec. 12, T 27N, R 5E

Dear Ms. Hunziker:

Inspection reports indicate that the injection pressure for the referenced injection wells exceeded the operating pressure limits.

The Safe Drinking Water Act authorizes the Environmental Protection Agency (EPA) to require injection wells to comply with the injection pressure limitation. Under the Act, the EPA can issue orders or administrative penalties for exceeding the authorized maximum injection pressure at the wellhead. To avoid this type of action, please take necessary action to limit pressure at the wellhead of the referenced wells to 850psi.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

REPLY TO: 6EN-WR

Certified Mail 7007 1490 0002 3413 8393 - Return Receipt Requested

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Termination of Authorization to Inject

Well ID:	Well No.	Location : Osage County, Oklahoma
OS6273.005	23-W41	NW/4, Sec. 14, T 27N, R 5E
OS6273.004	23-W28	NW/4, Sec. 14, T 27N, R 5E
OS6273.009	24-W41	NW/4, Sec. 14, T 27N, R 5E
OS6273.002	23-W23	NW/4, Sec. 14, T 27N, R 5E
OS6273.006	24-W41	NE/4, Sec. 14, T 27N, R 5E
OS6273.019	31-W42	SW/4, Sec. 14, T 27N, R 5E
OS6273.039	32-W25	NW/4, Sec. 14, T 27N, R 5E

Dear Ms. Hunziker:

Field reports indicate that two plugged and abandoned wells within the Area of Review (AOR) of the referenced injection wells have become compromised due to the high pressure in the North Burbank Unit Permit area. Therefore, authorization for the wells to inject is terminated. You must cease use of the wells for underground injection and disconnect injection pipelines from the wellheads within five days from the date of this letter. You may resume use of the wells for fluid injection after you complete proper plugging of compromised wells within the AOR.

Continued use of the wells for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties. Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

John Blevins
Director
Compliance Assurance and
Enforcement Division

cc: BIA, Minerals Branch

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Termination of Authorization to Inject and Requirement to cease injection

EPA ID	Well No.	Location: Osage County, Oklahoma
OS5457	Williams 2	SW/4, Sec. 29, T 28N, R 8E
OS5802	Nomo 4	NW/4, Sec. 04, T 27N, R 8E
OS6300	NBU 14W-5	SE/4, Sec. 10, T 27N, R 5E

Dear Ms. Hunziker

The referenced injection wells failed mechanical integrity tests therefore authorization to inject for these wells is terminated. You must cease use of the wells for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the wells for fluid injection after you demonstrate mechanical integrity and receive authorization to inject from this office.

Continued use of the wells for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Overdue Mechanical Integrity Test and Test Failures

Inventory No.	Well No.	Location-Osage County, Oklahoma	<u>Status</u>
OS0359	44W28	NE/4, Sec. 19, T 27N, R 6E	MIT Fail 8/13/14
OS0533	87-W3	SE/4, Sec. 31, T 27N, R 6E	MIT Fail 9/30/14
OS0568	95-W3	NE/4, Sec. 06, T 26N, R 6E	MIT Fail 9/3/14
OS0569	95-W4	NE/4, Sec. 06, T 26N, R 6E	MIT Fail 9/3/14
OS3994	M-W14	NE/4, Sec. 10, T 25N, R 6E	MIT Fail 7/1/13
OS4671	W-4	NW/4, Sec. 4, T 23N, R 7E	MIT Fail 6/19/14
OS4778	13	SW/4, Sec. 32, T 28N, R 8E	Overdue 7/14/14

Dear Ms. Hunziker:

The referenced injection wells failed mechanical integrity tests or are overdue for testing. They are, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the wells. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the wells for fluid injection. You could resume use of the wells for fluid injection after demonstrating that they have mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the wells or cease using them for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

October 20, 2014

REPLY TO: 6EN-WR

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Plugging Requirement

Inventory No.	Well No.	Location: Osage County, Oklahoma
OS0243	NBU 19-W26	SW/4, Sec. 07, T 27N, R 06E
OS0274	NBU 25W-28	NW/4, Sec. 13, T 27N, R 05E
OS0360	NBU 45W-21	NW/4, Sec. 20, T 27N, R 06E
OS0364	NBU 45W-26	NW/4, Sec. 20, T 27N, R 06E
OS3289	NBU 41W-28	NW/4, Sec. 24, T 27N, R 05E

Dear Ms. Hunziker:

Inspection reports indicate that the referenced injection well is inactive. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. We may extend the plugging deadline if you have an acceptable plan for future use of the well. Send us your plan for future use within 30 days from the date of this letter if you want an extended plugging deadline.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist

Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department

BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

REPLY TO: 6EN-WR

Mr. Charlie Paulson B.O.G. Osage, L.L.C. P.O. Box 13178 Oklahoma City, OK 73114

Re: Mechanical Integrity Test Failures

Inventory No.Well No.Location-Osage County, OklahomaOS13641NE/4, Sec. 32, T 22N, R 10EOS1377W-6SW/4, Sec. 32, T 22N, R 10E

Dear Mr. Paulson:

On August 22, 2014, the referenced injection wells failed a mechanical integrity tests. They are, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the wells. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the wells for fluid injection. You could resume use of the wells for fluid injection after demonstrating they have mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested. Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

REPLY TO: 6EN-WR

Certified Mail #7007 1490 0002 3413 8423 - Return Receipt Requested

Mr. John Burroughs Warren American Oil Company, LLC 6585 South Yale, Suite 800 Tulsa, OK 74136

Re: Termination of Authorization to Inject

Permit No.: 06S1264P5275

Well No.: 8A

Location: NE/4, Sec. 5, T 24N, R 10E

Osage County, Oklahoma

Dear Mr. Burroughs:

An August 14, 2014, inspection report indicates the referenced well failed a mechanical integrity test. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete a mechanical integrity test and receive from this office authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

Certified Mail # - 7007 1490 0002 3413 8416 - Return Receipt Requested

Mr. Jim Heslet H&K Operating P.O. Box 3344 Bartlesville, TX 74006

Re: Termination of Authorization to Inject

Permit No.: 06S1261P6187

Well No.: 4A

Location: NE]/4, Sec. 7, T 27N, R 12E

Osage County, Oklahoma

Dear Mr. Heslet:

A July 7, 2014, inspection report shows the referenced well failed a mechanical integrity test (MIT). Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete an MIT and receive authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

Certified Mail # 7007 1490 0002 3143 8461 - Return Receipt Requested

Mr. Ed Chesny Sullivan Osage, LLC 1437 S. Boulder Ave, Suite 1200 Tulsa, OK 74119

Re: Termination of Authorization to Inject

Permit No.: 06S1261P6170

Well No.: 15-32

Location: SE/4, Sec. 32, T 25N, R 061E

Osage County, Oklahoma

Dear Mr. Chesny:

A file review indicates the referenced injection well is overdue for a mechanical integrity test (MIT). Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete an MIT and receive authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA. Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8447 - Return Receipt Requested

Ms. Sara Evans Red Fork Investments, Inc. 1437 S. Boulder, Suite 700 Tulsa, OK 74119

Re: Termination of Authorization to Inject

Permit No.: 06S1261P6128

Well No.: 1-28

Location: SW/4, Sec. 28, T 20N, R 12E

Osage County, Oklahoma

Dear Mr. Evans:

A file review indicates the referenced well does not have mechanical integrity. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete a mechanical integrity test and receiving authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8430 - Return Receipt Requested

Ms. Jenny Buttram RDT Properties, Inc. 2431 East 61st St. Ste 850 Tulsa, OK 74136

Re: Termination of Authorization to Inject

Permit No.: 06S1262P6105

Well No.: B-11

Location: NE/4, Sec. 4, T 22N, R 12E

Osage County, Oklahoma

Dear Mr. Jones:

An August 26, 2014, inspection report indicates that the referenced well does not have mechanical integrity as required by Osage Underground Injection Control (UIC) regulations and the referenced permit. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete a mechanical integrity test and receiving authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

November 10, 2014

REPLY TO: 6EN-WR

Mr. Denny Hurst Petromerica Operating, LLC P.O. Box 988 Skiatook, OK 74070

Re: Violation of Injection Pressure Limit

Inventory No.: OS5759

Well No.: 2

Location: SE/4, Sec. 29, T 26N, R 11E

Osage County, Oklahoma

Dear Mr. Hurst:

A July 14, 2014, inspection report indicates that the injection pressure for the referenced injection well exceeded the limit of 425 psi.

The Safe Drinking Water Act authorizes the Environmental Protection Agency (EPA) to require injection wells to comply with the injection pressure limitation. Under the Act, the EPA can issue orders or administrative penalties for exceeding the authorized maximum injection pressure at the wellhead. To avoid this type of action, please take necessary action to limit pressure at the wellhead of the referenced well to 425 psi.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga

Environmental Scientist

Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

November 11, 2014

REPLY TO: 6EN-WR

A.J Cooper Strike Axe Oil & Gas 11472 Okesa Road Bartlesville, OK 74003

Re: Plugging Requirement

Inventory No.: OS5707

Well No.: 2

Location: NW/4, Sec. 20, T 26N, R 11E

Osage County, Oklahoma

Dear Mr. Cooper:

A July 16, 2014, inspection report indicates that the referenced injection well is inactive. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. We may extend the plugging deadline if you have an acceptable plan for future use of the well. Send us your plan for future use within 30 days from the date of this letter if you want an extended plugging deadline.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department BIA, Minerals Branch

December 6, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8485 - Return Receipt Requested

Ms. Romonza Spess Vice President Noble Resources, Inc. P.O. Box 570 Mannford, OK 74044

Re: Termination of Authorization to Inject

Permit No.: 06S1261P5579

Well No.: 3

Location: NW/4, Sec. 33, T 25N, R 03E

Osage County, Oklahoma

Dear Ms. Spess:

The referenced injection well is overdue for a mechanical integrity test (MIT). Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete an MIT and receiving authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA. Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

December 3, 2014

REPLY TO: 6EN-WR

Mr. Donald C. Schroder Watchman-Schroder P.O. Box 1138 Pawhuska, OK

Re: Plugging Requirement

Inventory No.: OS5391 Well No.: 2-A

Location: SE/4, Sec. 35, T 29N, R 10E

Osage County, Oklahoma

Dear Mr. Schroder:

A June 26, 2014, inspection report indicates that the referenced injection well is inactive. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. Therefore, you must plug the well by June 26, 2015. We may extend the plugging deadline if you have an acceptable plan for future use of the well. Send us your plan for future use within 30 days from the date of this letter if you want an extended plugging deadline.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga

Environmental Scientist

Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department

BIA, Minerals Branch

December 8, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8492 - Return Receipt Requested

Mr. Dan Jacobs Ceja Corporation 1437 S. Boulder, Ste. 1250 Tulsa, OK 74119

Re: Termination of Authorization to Inject

Permit No.: OS5290 Well No.: B-1

Location: NE/4, Sec. 4, T 25N, R 04E

Osage County, Oklahoma

Dear Mr. Jacobs:

An August 11, 2014, inspection report indicates the referenced well failed a mechanical integrity test (MIT). Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete an MIT and receive authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

Certified Mail # 7007 1490 0002 3143 8454 - Return Receipt Requested

Mr. Kenneth Y Park, Jr. KY Park Oil Company, LLC 9150 West Highway 20 Skiatook, OK 74070

Re: Termination of Authorization to Inject

Permit No.: 06S1261P5256

Well No.: 2A

Location: NW/4, Sec. 23, T 23N, R 11E

Osage County, Oklahoma

Dear Mr. Park:

A file review indicates the referenced injection well is overdue for a mechanical integrity test (MIT). Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete an MIT and receive authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA. Minerals Branch

December 2, 2014

REPLY TO: 6EN-WR

Mr. Mark Helmer Helmer Oil P.O. Box 1325 Pawhuska, OK 74056

Re: Overdue Mechanical Integrity

Inventory No. Well No. Location-Osage County, Oklahoma OS4619 2 NE/4, Sec. 4, T 23N, R 08E

Dear Mr. Helmer:

A file review indicates the referenced injection well is overdue for a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

Mr. Mike Brown GBC Petroleum P.O. Box 82 Hominy, OK 74035

Re: Overdue Mechanical Integrity Test

Inventory No. Well No. Location-Osage County, Oklahoma SW/4, Sec. 33, T 24N, R 08E

Dear Mr. Brown:

A file review indicates the referenced injection well is overdue for a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders
Associate Director
Water Enforcement Branch

Mr. Gary Warehime Double G Oil, LLC 1219 West Frank Phillips Blvd. Bartlesville, OK 74003

Re: Mechanical Integrity Test Failure

<u>Inventory No.</u> <u>Well No.</u> <u>Location-Osage County, Oklahoma</u> OS3331 MARTY-3A SE/4, Sec. 10, T 27N, R 11E

Dear Mr. Warehime:

Our office is in receipt of documentation naming Double G Oil, LLC as owner and operator of the referenced well. A file review indicates the well is overdue for a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity. Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

December 6, 2014

REPLY TO: 6EN-WR

Mr. Jerry Clemshire 1224 South Eastern Hominy, OK 74035

Re: Mechanical Integrity Test Failure

Inventory No. Well No. Location-Osage County, Oklahoma OS2586 1 NE/4, Sec. 8, T 25N, R 06E

Dear Mr. Clemishire:

A file review indicates the referenced injection well's mechanical integrity test was overdue on December 11, 2013. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Therefore you must immediately cease injection and demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

November 14, 2014

REPLY TO: 6EN-WR

T.D. Robbins 3003 East 78th Place Tulsa, OK 74136

Re: Mechanical Integrity Test Failure

<u>Inventory No.</u> <u>Well No.</u> <u>Location-Osage County, Oklahoma</u> OS1463 10 <u>Location-Osage County, Oklahoma</u> SW/4, Sec. 11, T 21N, R 09E

Dear Mr. Robbins:

On July 18, 2014, the referenced injection well failed a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

December 2, 2014

REPLY TO: 6EN-WR

Mr. Steven Cornelius Ms. Shelly Cornelius P.O. Box 132 Collinsville, OK 74021

Re: Mechanical Integrity Test Failure

Inventory No.	Well No.	Location-Osage County, Oklahoma
OS1329	Breene 2	SE/4, Sec. 22, T 21N, R 10E
OS3844	Breene 5	SW/4, Sec. 23, T 21N, R 10E

Dear Mr. Cornelius:

File review indicates the referenced injection wells are overdue for mechanical integrity tests. They are, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the wells. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the tests.
- 2. Cease use of the wells for fluid injection. You could resume use of the wells for fluid injection after demonstrating that they have mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the wells or cease using them for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders
Associate Director
Water Enforcement Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

December 22, 2014

REPLY TO: 6EN-WR

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Plugging Requirement

Inventory No.: OS0904 Well No.: SSKW 4-3

Location: SW/4, Sec. 7, T 25N, R 07E

Osage County, Oklahoma

Dear Ms. Hunziker:

A November 21, 2014, inspection report indicates that the referenced injection well is inactive. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. We may extend the plugging deadline if you have an acceptable plan for future use of the well. Send us your plan for future use within 30 days from the date of this letter if you want an extended plugging deadline.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga

Environmental Scientist Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department

BIA, Minerals Branch

Certified Mail # 7007 1490 0002 3413 8478 - Return Receipt Requested

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Mechanical Integrity Deficiency

Inventory No. Well No. Location-Osage County, Oklahoma
OS0623 111-W3 NW/4, Sec. 08, T 26N, R 06E

Dear Ms. Hunziker:

On November 18, 2014, a field inspector determined through routine inspection that the referenced well no longer maintains mechanical integrity. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

March 17, 2015

REPLY TO: 6EN-WR

Mr. John Burroughs Warren American Oil Company 6585 South Yale Avenue Tulsa, OK 74147-0372

Re: Mechanical Integrity Test Failure

Inventory No. Well No. Location-Osage County, Oklahoma
OS0929 C-W4 NE/4, Sec. 12, T 27N, R 7E

Dear Mr. Burroughs:

On November 18, 2014, and January 5, 2015, the referenced injection well failed mechanical integrity tests. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity. Your March 13, 2015, electronic correspondence notified us that you have ceased injection, disconnected the well and have a plan for corrective action.

The Environmental Protection Agency (EPA) approves your corrective action plan to repair and use the well in the future or plug the well if repair fails. Your plan should adequately protect underground sources of drinking water (USDWs) in the vicinity of the well, when completed. You must complete the proposed work by April 30, 2015.

Before beginning the work, obtain the necessary permits from the Bureau of Indian Affairs (BIA) Osage Agency and plugging approval from an EPA Engineer. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 five days before testing the well so they can witness the test. After completing the work, submit an Osage Form No. 139 which shows completed work to the BIA and to this office.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA. Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

REPLY TO: 6EN-WR

Certified Mail # - Return Receipt Requested

Mr. Scott Robinowitz Vice President Grand Resources, Inc. 2448 East 81st Street, Suite 4040 Tulsa, OK 74137

Re: Termination of Authorization to Inject

Permit No.: 06S1264P5348

Well No.: 2C

Location: NE/4, Sec. 07, T 26N, R 11E

Osage County, Oklahoma

Dear Mr. Robinowitz:

The referenced injection well does not have mechanical integrity. Therefore, authorization to inject for this well is terminated. A March 20, 2015, inspection report indicates you have ceased injection and disconnect injection pipelines from the wellhead. The same report shows that fluid level in the well is above underground sources of drinking water (USDWs) in the area of the well.

Therefore, you must submit a corrective action plan to this office within 15 days from the date of this letter. That plan may include: plugging the well, repairing it so that it has mechanical integrity, lowering the static fluid level to at least 407 feet subsurface, or any other action which will adequately protect drinking water sources. Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

March 9, 2015

REPLY TO: 6EN-WR

Mr. Rick Hudson R & C Hudson Oil, LLC 24460 North 3980 Road Bartlesville, OK 74006

Re: Plugging Requirement

 Inventory No.
 Well No.
 Location: Osage County, Oklahoma

 OS4047
 1A
 SW/4, Sec. 20, T 23N, R 10E

 OS4702
 7
 NE/4, Sec. 24, T 22N, R 11E

 OS6216
 2
 NE/4, Sec. 24, T 22N, R 11E

Dear Mr. Hudson:

Your annual injection well reports indicate that the referenced injection wells are inactive. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. We may extend the plugging deadline if you have an acceptable plan for future use for each well. Send us your plans for future use within 30 days from the date of this letter if you want an extended plugging deadline.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga

Environmental Scientist

Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department

BIA, Minerals Branch

Ms. Melanie Crawford Regulatory Specialist II Linn Operating, Inc. 14000 quail Springs Parkway, Suite 5000 Oklahoma City, OK 73134

Re: Mechanical Integrity Deficiency

Inventory No.	Well No.	Location-Osage County, Oklahoma
OS3062	Bigheart 13	SE/4, Sec. 34, T 27N, R 06E
OS3046	WILF 14	NE/4, Sec. 03, T 26N, R 06E
OS3079	BRENNE 7	SE/4, Sec. 17, T 27N, R 06E

Dear Ms. Crawford:

Your February 9, 2015, letter, inspection reports, and file reviews indicate the referenced injection wells no longer have mechanical integrity. Therefore, the wells threaten to contaminate underground sources of drinking water and are noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity. Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the wells. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the tests.
- 2. Cease use of the wells for fluid injection. You could resume use of the wells for fluid injection after demonstrating they have mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the wells or cease using them for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

REPLY TO: 6EN-WR

Mr. Shelby Smith Petromerica Operating, LLC 1316 West 4th Street Skiatook, OK 74070

Re: Failure to Report Transfer of Operation Control

Permit No.: Inventory ID: Well No.: Location:

Caddo County, Oklahoma

06SOKA1P9018 OK9018 1-1 NE/4, Sec. 34, T 6N, R 12W 06SOKA1P9019 OK9019 2-1 SE/4, Sec. 34, T 6N, R 12W

Dear Mr. Hurst:

Your recent letter indicate that Petromerica Operating, LLC is the current owner and operator of the referenced injection wells. Osage Underground Injection Control regulations requires operators to report a change of ownership immediately upon completion. Send copies of your Osage Mineral Lease and Surety or Bond information to this office with 15 days of the date of this letter.

The Safe Drinking Water Act authorizes the Environmental Protection Agency (EPA) enforce reporting requirements. Under the Act, the EPA can issue orders or administrative penalties for failure to comply with the Act. To avoid this type of enforcement action, send the required documentation.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

May 4, 2015

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8584 - Return Receipt Requested

Ms. Vicki Shipley Grand Resources Production Manager 2448 East 81st Street, Suite 4040 Tulsa. OK 74137-4201

Re: Termination of Authorization to Inject

Permit No.: 06S1261P6285

Well No.: 1A

Location: SE/4, Sec. 24, T 24N, R 11E

Osage County, Oklahoma

Dear Ms. Shipley:

The referenced injection well is overdue for a mechanical integrity test. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you complete a successful mechanical integrity test and receive authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

June 25, 2015

REPLY TO: 6EN-WR

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7005 1820 0003 7449 9704

Mr. John Burroughs Warren American Oil Company, LLC 6585 South Yale, Suite 800 Tulsa, OK 74136

Re:

Termination of Authorization to Inject:

Inventory No.

Well No.

Location: Osage County, Oklahoma

OS5273032

5D1

SE/4 Sec. 5, T 24N, R 10E

OS5275044

4B1

SW/4 Sec. 4, T 24N, R 10E

Dear Mr. Burroughs:

On June 4, 2015, the Environmental Protection Agency (EPA) conducted an inspection of the above referenced injection wells. The inspection reports indicated the injection wells failed mechanical integrity tests (MITs). Therefore, authorization to inject for these wells is terminated. You must cease use of the wells for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the wells for fluid injection after you successfully complete MITs and attain authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act (SDWA) and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely,

Associate Director

Water Enforcement Branch

cc:

BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS TX 75202-2733

MAY 0 4 2015

REPLY TO: 6EN-WR

Ms. Allison Holman Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Mechanical Integrity Test Failures

1001 111001		# * # *	
Inventory No.	Well No.	Location-Osage County, Oklahoma	MIT Status
OS0052	1	NW/4, Sec. 29, T 24N, R 04E	Fail 5/25/2012
OS0602	104-W4	SW/4, Sec. 05, T 26N, R 06E	Fail 3/15/2012
OS0568	95-W3	NE/4, Sec. 06, T 26N, R 08E	Fail 1/07/2015
OS0595	102-W5	SW/4, Sec. 06, T 26N, R 06E	Overdue 8/12/2012
OS0634	117-W9	SW/4, Sec. 08, T 26N, R 06E	Overdue 12/1/2013
OS0665	137-W4	NW/4, Sec. 28, T 26N, R 06E	Overdue 4/28/2014

Dear Ms. Holman:

The referenced injection wells failed mechanical integrity tests or are overdue for testing. They are therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity. Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

So-Jerry Saunders
Associate Director

Water Enforcement Branch

cc:



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS TX 75202-2733

MAY 1 4 2015

REPLY TO: 6EN-WR

Steven & Shelly Cornelius P.O. Box 31 Collinsville, OK 74021

Re:

Denial of Plan for Future Use and Failure to Complete Corrective Action

Inventory No: OS3849

Well No.:

7

Location:

SW/4, Sec. 14, T21N, R10E

Osage County, Oklahoma

Dear Mr. & Mrs. Cornelius:

You're April 7, 2015, Plan for Future Use of the referenced injection well is denied. Our November 26, 2014, Approval of Corrective Action required you to prevent fluids from moving through the referenced well bore into underground sources of drinking water (USDWs). A file review indicates you did not complete corrective action.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to protect USDWs from contamination caused by underground injection wells. To avoid additional enforcement, you must complete corrective action to reduce fluid level in the well to 200 feet subsurface or plug the well within 30 days from the date of this letter.

Sincerely yours,

Willie Lane, Jr.

Chief

Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department BIA, Minerals Branch

Certified Mail # 7007 1490 0002 3413 8515 - Return Receipt Requested

Mr. Rusty Miner Earl Oil Co PO Box 417 Drumright, OK 74030

Re: Termination of Authorization to Inject

Permit No.: 06SOKP1P9035

Well No.: 1

en No..

Location: SE/4, Sec. 29, T 19N, R 5E

Payne County, Oklahoma

Dear Mr. Miner:

A June 23, 2015, inspection report indicates the referenced injection well failed a mechanical integrity test (MIT). Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete an MIT and receive written authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties. Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: Bureau of Land Management, Oklahoma Field Office Bureau of Indian Affairs, Southern Plains Regional Office

(Attn: Natural Resources)

Mr. Rick Davis

Pawnee Nation Department of

Environmental Conservation and Safety

Certified Mail #7007 1490 0002 3413 8607 - Return Receipt Requested

Ms. Cara Dillion BGI Resources, LLC 624 South Boston Ave, Suite 750 Tulsa, OK 74119

Re: Termination of Authorization to Inject / Corrective Action Plan Approval

Inventory No.: OS6226 Well No.: Ridge 1

Location: SW/4 Sec. 14, T 28N, R 07E

Osage County, Oklahoma

Dear Ms. Dillon:

A May 7, 2015, inspection report indicates the referenced injection well failed a mechanical integrity test. Therefore, authorization to inject for this well is terminated. Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Your July 14, 2015, corrective action plan to plug and abandon the well should adequately protect underground sources of drinking water (USDWs) in the vicinity of the well, when completed. You must complete the proposed work December 31, 2015. Before beginning the work, obtain the necessary permits from the Bureau of Indian Affairs (BIA) Osage Agency. Submit copies of your plugging plans, BIA approved work plans to this office. After completing the work, submit an Osage Form No. 139 which shows completed work to the BIA and to this office.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders
Associate Director
Water Enforcement Branch

cc: BIA, Minerals Branch

Certified Mail #7007 1490 0002 3413 8621 - Return Receipt Requested

Mr. Dustin Kerbs Performance Energy Resources P.O. Box 628 Barnsdall, OK 74002

Re: Termination of Authorization to Inject

Permit No. / EPA ID Well No. Location: Osage County, Oklahoma N/A / OS4626 524 NW/4, Sec. 24, T 26N, R 10E OS5364 / 06S1262P5364 3 SW/4, Sec. 14, T 27N, R 11E OS6247 / 06S1262P6247 21-6 SE/4, Sec. 21, T 24N, R 10E

Dear Mr. Kerbs

Recent mechanical integrity test (MIT) reports show the referenced injection wells failed mechanical integrity tests. Therefore, authorization to inject for these wells is terminated and you must cease use of each well for underground injection of fluids and disconnect injection pipelines from the wellheads within five days from the date of this letter. You may resume use of the wells for fluid injection after you successfully complete an MIT and receive authorization to inject.

Continued use of the wells for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties. Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA. Minerals Branch

August 26, 2015

REPLY TO: 6EN-WR

Mr. J.P. Long, Jr. 2200 Lynn rd. Pawhuska, OK 74056

Re: Mechanical Integrity Test Failure

Inventory No.Well No.Location-Osage County, OklahomaOS3621Ted 2-ANE/4, Sec. 03, T 24N, R 06EOS4774Mellundore 8-BSE/4, Sec. 17, T 29N, R 11E

Dear Mr. Long:

Files indicate that the referenced injection wells failed mechanical integrity tests. They are, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the wells. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the wells for fluid injection. You could resume use of the wells for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested. Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

September 3, 2015

REPLY TO: 6EN-WR

Certified Mail #7007 1490 0002 3413 8638 - Return Receipt Requested

Mr. Clemishire B&G Oil Company P.O. Box 558 Hominy, OK 74035-0558

Re: Termination of Authorization to Inject

Permit No.: 06S1261P5747

Well No.: OS5747

Location: NE/4, Sec. 06, T 22N, R 09E

Osage County, Oklahoma

Dear Mr. Clemishire:

File review indicates that the referenced injection well is overdue for a mechanical integrity testing. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully demonstrate mechanical integrity and receive authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions. Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA. Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

September 14, 2015

REPLY TO: 6EN-WR

H.C. Glenn 207 N. Dunlap Cleveland, OK 74020

Re: Termination of Authorization to Inject

Inventory No: OS6163 Well No.: #5-28

Location: SE/4, Sec. 28, T21N, R09E

Osage County, Oklahoma

Dear Mr. Glenn:

An August 11, 2015, inspection report indicates the referenced injection well failed a mechanical integrity test. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully demonstrate mechanical integrity and receive authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties. Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

for

Willie Lane, Jr.

Chief

Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department BIA, Minerals Branch